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**ATTORNEYS FOR HC-7502 GREENVILLE AVENUE, LLC
AND CARTER/VALIDUS OPERATING PARTNERSHIP, LP**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
WALNUT HILL PHYSICIANS'	§	CASE NO. 17-32255-BJH
HOSPITAL, LLC,	§	
	§	Chapter 7
DEBTOR	§	

**SUPPLEMENT TO OBJECTION TO SECOND INTERIM APPLICATION OF
MUNSCH HARDT KOPF & HARR, P.C. FOR THE ALLOWANCE OF FEE AND
REIMBURSEMENT OF
EXPENSES AS GENERAL COUNSEL TO THE TRUSTEE AND REQUEST
FOR PAYMENT OF SAME**

HC-7502 Greenville Avenue, LLC (the "Landlord") and Carter/Validus Operating Partnership, LP ("CV Op," together, with the Landlord, the "CV Entities"), creditors and parties-in-interest in the above-styled and captioned case (the "Case"), file this Supplement (the "Supplement") to the *Objection to Second Interim Application of Munsch Hardt Kopf & Harr, P.C. for the Allowance of Fee and Reimbursement of Expenses as General Counsel to the Trustee and Request for Payment of Same* [Docket No. 376] (the "Objection") filed by the CV Entities in response to the *Second Interim Application of Munsch Hardt Kopf & Harr, P.C. for the Allowance of Fee and Reimbursement of Expenses as General Counsel to the Trustee and*

Request for Payment of Same [Docket No. 365] (the "Second Fee Application") filed by Munsch Hardt Kopf & Harr, P.C. (the "Applicant"), general counsel to Scott M. Seidel, the duly appointed Chapter 7 Trustee of Walnut Hill Physicians' Hospital, LLC's bankruptcy estate (the "Estate"), and respectfully state as follows:

1. As stated in the Objection, the CV Entities are concerned that the Requested Fees (as defined by the Second Fee Application) and Requested Expenses (as defined by the Second Fee Application) requested in the Second Fee Application total nearly the entire amount of the Trustee's unencumbered funds on hand. Additionally, the CV Entities are concerned that the Estate may be administratively insolvent. Attached as **Exhibit "A"** is a summary of the administrative claims requested and paid in this Case.

2. However, after further discussing the Second Fee Application and the CV Entities' Objection with the Applicant, the CV Entities are willing to allow an interim payment of 50% of the Requested Fees and 100% of the Requested Expenses, in the total amount of \$273,978.68, subject to total disgorgement. This is consistent with the percentage paid to Applicant in connection with the Applicant's first fee application.

3. The CV Entities expressly reserve the right to object, on any basis, to any interim or final fee application or application for administrative expense filed by the Applicant in this Case, including but not limited to, any final fee application related to the Requested Fees and Requested Expenses, on any grounds.

DATED: September 11, 2018.

Respectfully submitted,

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By: /s/ Phillip Lamberson

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**ATTORNEYS FOR HC-7502
GREENVILLE AVENUE, LLC AND
CARTER/VALIDUS OPERATING
PARTNERSHIP, LP**

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2018, a true and correct copy of the foregoing was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case.

/s/ Annmarie Chiarello

One of Counsel